

CLYDE & CO US LLP
355 S. Grand Avenue, 14th Floor
Los Angeles, California 90071
Telephone: (213) 358-7600

Kevin R. Sutherland (State Bar No. 163746)
Natasha N. Mikha (State Bar No. 270731)
CLYDE & CO US LLP
355 S. Grand Avenue, 14th Floor
Los Angeles, California 90071
Telephone: (213) 358-7600
Facsimile: (213) 358-7699
Email: kevin.sutherland@clydeco.us
natasha.mikha@clydeco.us

Jeffrey J. Ellis (admitted *pro hac vice*)
CLYDE & CO US LLP
405 Lexington Avenue, 16th Floor
New York, New York 10174
Telephone: (212) 710-3900
Facsimile: (212) 710-3950
Email: jeff.ellis@clydeco.us

Attorneys for Defendant
FRONTIER AIRLINES, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ANDREA RIDGELL, on behalf of
herself and others similarly situated,

Plaintiff,

v.

FRONTIER AIRLINES, INC. a
Colorado corporation; AIRBUS
S.A.S., a foreign corporation doing
business in the State of California;
AIRBUS GROUP HQ, INC., a
corporation doing business in the State
of California,

Defendants.

Case No.: 2:18-CV-04916 PA (AFMx)

DECLARATION OF HENRY
VILLAREAL IN SUPPORT OF
FRONTIER AIRLINES INC.'S
MOTION FOR SUMMARY
JUDGMENT

Date: June 17, 2019

Time: 1:30 p.m.

Place: Courtroom of the Honorable Percy
Anderson




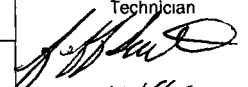
I, Henry Villareal, declare and state as follows:

1. I am employed by Frontier Airlines, Inc. ("Frontier") in the position of
Inspector. I have been employed in this position 1 year, prior to being an Inspector
my position was aircraft Maintenance Technician. On June 3, 2017 I was an
aircraft Maintenance Technician. In both position, I hold an FAA certificate,
licensing me to inspect and repair FAA-certified aircraft operated by Frontier.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 17, 2019, at Denver, Colorado.

Henry Villareal
HENRY VILLAREAL

Exhibit C

| FRONTIER | | Aircraft Flight Log | | | | | | Form Number: 30740 Date: 06/17/09 | | 9005248 | |
|--|-----|---|--|---------------------------------|--|---|-----|--------------------------------------|--|---------------------------------------|--|
| A/C NUMBER 308 | | CAPTAIN'S NAME Jett Jansich | | EMP #: 411643 | | MAINTENANCE CHECK COMPLIED WITH | | | | STATION | |
| LOCAL MM/DD/YY 06/02/17 | | CAPTAIN'S SIGNATURE  | | AIRWORTHINESS RELEASE SIGNATURE | | | | | | EMP #: | |
| FLIGHT | | 4B 1630 | | | | | | | | | |
| STATION DEN LAX PHX | | | | | | | | | | | |
| ON | | 0426 0536 | | OIL ADDED | | QTS | STA | INITIALS | | QTS | STA |
| OFF | | 0232 0715 | | ENG #1 | | | | | | | |
| FOB QTY | | 10.4 21.8 | | ENG #2 | | | | | | | |
| TOGA T/O | | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | | APU | | | | | | | |
| SECURITY INSPECTION COMPLETED <input type="checkbox"/> FOR CALENDAR DAY _____ MM/DD/YY | | | | | | | | | | | |
| ITEM | STA | DISCREPANCIES OR COMMENTS | | | | ITEM | STA | ATA | MAINTENANCE ACTION | | SIGNATURE |
| 1 | PHX | FA's reported sulfur/propane smell in cabin followed by burning/itching eyes and throat, the smell was followed by some haze in cabin. | | | | 1 | DEN | 05-50 | RAW #1 & #2 ENG'S. W/PACKS. RAN A.P.U. W/PACKS. INSPECTED A.P.U. INSPECTED AC BAY (PACKS 1&2). INSPECTED HYD. BAYS, AFT PIT, FWD PIT (RECIRC. FILTERS). INSPECTED AVIONICS COMPARTMENTS. NO DEFECTS NOTED. REF. T.S.M. 05-50-00-810-831-A. | | Technician  EMP #: 404805 DATE: 06-03-17 RII REQUIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Inspector |
| | | | | | | P/N OFF: | | S/N OFF: | | EMP #: | |
| | | | | | | P/N ON: | | S/N ON: | | DATE: | |
| | | | | | | | | | | <input type="checkbox"/> MAJOR REPAIR | |
| ITEM | STA | DISCREPANCIES OR COMMENTS | | | | ITEM | STA | ATA | MAINTENANCE ACTION | | SIGNATURE |
| 01 | PHX | Landed 10,000 lbs overweight. (Overweight Landing)  | | | | 2 | PHX | 31-00 | NO trigger codes produced in the DMU/FPIMU Ref AMM 31-37-00-200-001-A NO record in aides stored reports. OK to continue | | Technician  EMP #: 404655 DATE: 06/03/17 RII REQUIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Inspector |
| | | | | | | P/N OFF: | | S/N OFF: | | EMP #: | |
| | | | | | | P/N ON: | | S/N ON: | | DATE: | |
| | | | | | | | | | | <input type="checkbox"/> MAJOR REPAIR | |
| Discrepancies Continued on Logbook page _____ | | | | | | FMIS Entry Made by Employee No. 011055 | | | | | |

PROOF OF SERVICE

**STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

I am a employed in the County of San Francisco, State of California, I am over the age of eighteen years, and not a party to the within action. My business address is 101 Second Street, 24th Floor, San Francisco, California 94105.

On May 20, 2019, I served the document(s) described as:

**DECLARATION OF HENRY VILLAREAL IN SUPPORT OF FRONTIER
AIRLINES INC.'S MOTION FOR SUMMARY JUDGMENT**

on the parties in this action addressed as follows:


SEE ATTACHED SERVICE LIST

in the following manner:

- ☐ **(BY FAX):** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m.
- ☐ **(BY MAIL):** as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☐ **(BY OVERNIGHT DELIVERY):** I caused such envelope(s) to be delivered to an overnight delivery carrier with delivery fees provided for, addressed to the person(s) on whom it is to be served.
- ☐ **(BY PERSONAL SERVICE):** I caused such envelope(s) to be delivered by hand this date to the offices of the addressee(s).
- ☒ **(BY CM/ECF):** by electronic filing system with the clerk of the Court which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have filed a Notice of Consent to Electronic Service in this action:

I declare I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on May 20, 2019, at San Francisco, California.


Sonja L. Gray

CLYDE & CO US LLP
633 West 5th Street, 26th Floor
Los Angeles, California 90071
Telephone: (213) 358-7600

SERVICE LIST

Marcus J. Bradley, Esq. (SBN 174156)
Kiley L. Grombacher, Esq. (SBN 245960)
BRADLEY/GROMBACHER LLP
2815 Townsgate Road, Suite 130
Westlake Village, California 91361
Tel: (805) 270-7100
Fax: (805) 270-7589
E-Mail: mbradley@bradleygrombacher.com
kgrombacher@bradleygrombacher.com

Attorneys for Plaintiff

Kristi D. Rothschild, Esq. (SBN 222727)
Julian Alwill, Esq. (SBN 259416)
ROTHSCHILD & ASSOCIATES, APC
27 W. Anapamu Street, Suite 289
Santa Barbara, California 93101
Tel: (805) 845-1190
Fax: (805) 456-0132
E-Mail: krrothschild@kdrllawgroup.com
jalwill@kdrllawgroup.com

Attorneys for Plaintiff